Remarks

Applicant has carefully studied the outstanding Office Action mailed March 5, 2004, and the newly cited art. The present response is intended to be fully responsive to the rejection raised by the Office Action and is believed to place the application in condition for allowance. Further, the Applicant does not acquiesce to any of the Office Action rejections not particularly addressed. Favorable reconsideration and allowance of the application is respectfully requested.

1. Summary of Office Action

The Examiner rejected claims 1-3, 5, 6, 8-12, 26, 27, and 32-36 as anticipated by White et al. (U.S. Patent No. 6,069,890), and the Examiner rejected claims 4, 7, 13-20, and 37 under 35 U.S.C. §103(a) as unpatentable over White in view of Goldberg et al. (U.S. Patent No. 6,304,636). The Examiner also rejected claims 21, 22, 24, and 28-31 under §103(a) as unpatentable over White in view of O'Donovan (U.S. Patent No. 6,396,908). Finally, The examiner rejected claims 23 and 25 under §103(a) as unpatentable over White in view of O'Donovan and further in view of Goldberg.

2. Summary of Claim Amendments

Applicant has amended independent claim 1 and its dependents to include converting a destination identifier of the first type to a plurality of destination identifiers of a second type, and sending a message to each of a plurality of destination subscriber entities using the plurality of destination identifiers of the second type. Applicant has also amended independent claims 13, 21, 32, and 43 and their dependents to include selecting a given e-mail address from a plurality of e-mail addresses associated with a second subscriber entity (or selecting a destination identifier from a plurality of destination identifiers). These features are clearly understood from the specification, which explains that a subscriber may have many e-mail addresses and

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describes several methods of selecting a given e-mail address. (See, e.g., page 24, line 20 – page 25, line 20).

Applicant has amended claims 6, 15, and 24 to eliminate the Markush structure and more clearly define the destination identifier of the first type as a mobile identification number (MIN).

Finally, Applicant has added new claims 38-44. These claims provide additional limitations for selecting the given e-mail address from a set of at least two associated e-mail addresses. For example, claim 38 includes a first rule for selecting a first e-mail address during a first time period, and a second rule for selecting a second e-mail address during a second time period. Claims 40 and 44 further define a home e-mail address. Additionally, claim 41 applies a set of subscriber preferences to select the given e-mail address, and claims 42-43 include indicia within a management code for selecting the given e-mail address from the set of associated e-mail addresses. (For support, see page 24, line 20 – page 25, line 20).

Pending in this application are claims 1-25 and 32-44 of which claims 1, 13, 21, 32, and 43 are independent and the remaining are dependent.

3.   **Claimed Invention**

Speaking generally, Applicant's claimed invention includes a one-to-many relationship between a destination identifier of a first type and set of destination identifiers of a second type. The one-to-many relationship may be used, for example, to convert a telephone number to a plurality of e-mail addresses. Alternatively, the telephone number may be converted to a given e-mail address that is selected from the plurality of associated e-mail addresses. The claims provide various methods for selecting the given e-mail address.

Claim 1, for instance, converts a destination identifier of the first type to a plurality of destination identifiers of the second type. Specifically, claim 1 provides for (i) receiving a call

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request with a destination identifier of a first type (such as a MIN) and a management code, (ii) converting the destination identifier of the first type to a plurality of destination identifiers of a second type (such as a set of e-mail addresses), (iii) receiving a message from a subscriber, and (iv) sending the message to each of a plurality of destination subscribers.

Alternatively, Claim 43 converts a telephone number to a given e-mail address that is selected from two or more e-mail addresses associated with the telephone number. Specifically, claim 43 provides for (i) receiving a call request including a telephone number and a management code, where the management code includes indicia for selecting the given e-mail address, (ii) selecting the given e-mail address from two or more e-mail addresses associated with the telephone number, (iii) receiving a voice message from the entity, and (iv) sending the voice message to the given e-mail addresses.

The claims additionally provide various methods of determining which destination identifier of the second type to select, including: using received instructions (claim 34), basing the decision on the management code (claim 36), applying stored rules (claim 38), differentiating according to time period (claim 39 & 40), and applying subscriber preferences (claim 41), for example.

4. Response to Claim Rejections

Applicant respectfully submits that the rejections of the pending claims are now moot. Even the combination of all three cited references (White, O'Donovan, and Goldberg) fails to disclose or suggest all of the elements recited in any of the pending claims.

At a minimum, for instance, the cited art fails to disclose or suggest (i) converting to a plurality of destination identifiers of a second type (independent claim 1), (ii) selecting a given identifier from a plurality of identifiers and converting a destination identifier of the first type to

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the given identifier (independent claims 13, 21, 32, and 43), (iii) any specific method of selecting the given identifier from the plurality (claims 34, 38-44), or (iv) a mobile identification number (MIN) in use as a destination identifier of the first type (claims 6, 15, 24).

At best, the cited art discloses (i) receiving a first destination identifier (telephone number) and a management code, and (ii) converting the first destination identifier to a second destination identifier (IP address or e-mail address).

Although the cited art discloses a conversion process, it does not disclose or suggest doing what is recited in applicant's claims. The references cited by the Examiner are limited to a one-to-one conversion relationship and do not contemplate a one-to-many relationship between the destination identifier of the first type and the plurality of destination identifiers of the second type. In the manner described above, a one-to-many relationship or equivalent is a limitation of each pending claim.

Further, the cited art does not contemplate a plurality of associated e-mail addresses or which of the plurality to select as the given e-mail address. (Independent claims 13, 21, 32, 43). Nor do the references contemplate any of the claimed methods of selecting a given e-mail address from a set of associated e-mail addresses. (Claims 34, 38-44).

Additionally, the cited art fails to suggest or disclose a mobile identification number (MIN) or its use as a destination identifier of the first type. (Claims 6, 15, 24).

Because the cited art does not disclose or suggest all of the elements of any of Applicant's claims, Applicant submits that the art fails to anticipate or render obvious any of the claims. Consequently, Applicant submits that all of the claims are now in conditions for allowance.
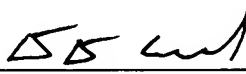
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Conclusion

In view of the amendments and remarks above, Applicant respectfully submits that the present application, including claims 1-25 and 32-44, is now in condition for allowance and solicits action to that end.

If there are any additional matters that may be resolved through a telephone interview, the Examiner is requested to contact Applicant's undersigned representative at (312)-913-3316.

Respectfully submitted,

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Dated: 6|2|04   By: _____

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